CONSTANGY, BROOKS & SMITH, LLC

ATTORNEYS AT LAW 100 N. CHERRY STREET SUITE 300

WINSTON-SALEM, NORTH CAROLINA 27101
TELEPHONE (336) 721-1001 • FACSIMILE (336) 748-9112
IN CHARLOTTE CALL (704) 344-1040

www.constangy.com



March 17, 2004

Michael S. Sahady 399 North Main Street Fall River, Massachusetts 02720

Via Facsimile and U.S. Mail Fax: (508) 674-8430

RE: Michael Rodio v. R.J. Reynolds Tobacco Company

Dear Michael:

I appreciate your faxing the Plaintiff's Initial Disclosures. With respect to the documents, we do not need copies of the following documents:

Employee Benefit Plan Booklet
Retirement Plans
Savings Plans
Group Insurance Plans
R.J. Reynolds Scholastic Savings Plan
Annual Statements of Employee Benefits
Group Health Insurance Plans
Investment Funds Plans
Statements under ERISA
W-2 Forms

With respect to the remaining documents, I would appreciate your office sending me copies of those documents. You can send me an invoice for any copying charges. I would like to receive these documents no later than the time you serve responses to outstanding discovery.

ARLINGTON, VA

ATLANTA, GA

BIRMINGHAM, AL

COLUMBIA, SC

JACKSONVILLE, FL

KANSAS CITY, MO

LAKELAND, FL

MACON, GA

NASHVILLE, TN

TAMPA, FL

WINSTON-SALEM, NC

If you have any questions or concerns with the above, please let me know. I also look forward to hearing from you regarding deposition dates in May.

Very truly yours,

W. R. Loftis, Jr.

WRL, Jr./te Enc.